

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS  
LICENSING AND DEVELOPMENT,

Plaintiff,

v.

DELL TECHNOLOGIES INC., DELL INC.,  
EMC CORPORATION, AND VMWARE,  
INC.,

Defendants.

Case No. 6:20-cv-00481-ADA

**JURY TRIAL DEMANDED**

**LETTERS OF REQUEST FOR FOREIGN DISCOVERY FROM INDIA**

Defendants', Dell Technologies Inc., Dell Inc., EMC Corporation, and VMware, Inc., (collectively "Defendants"), seek foreign discovery from a third party entity residing in India. Defendants have attached an Appendix with a Letter of Request which includes Document Requests and Deposition Topics. The chart below outlines the name of the entity Defendants seek foreign discovery from, the relevant case number, and the Patent at issue.

<b>Appx.</b>	<b>Name of Witness Entity</b>	<b>Relevance of Witness/Entity</b>	<b>Case No.</b>	<b>Relevant Patents</b>
A	Alcatel-Lucent India Ltd. and authorized representatives	Former assignee of a relevant patent	6:20-cv-00481	9,164,800

Defendants respectfully request that the Court execute the Letter of Request attached as Appendix A. Defendants further request that, after the Court has signed the Letter of Request, the Clerk of this Court authenticate the Court's signature under the seal of this Court, and return the original signed and sealed executed Letter, and two certified copies of the signed and sealed executed Letter, to Defendants' counsel, Barry K. Shelton, for delivery to the proper authority.

Plaintiff, WSOU Investments, LLC d/b/a Brazos Licensing and Development, indicated that it reserves the right to serve its own foreign discovery in the future.

Dated: November 6, 2020

By: /s/ Barry K. Shelton

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*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on November 6, 2020, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(b)(1).

/s/ Barry K. Shelton  
Barry K. Shelton